



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

March 31, 1986

RP:0057

Mr. Edward Yamada
Environmental Protection
and Health Services Division
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Yamada:

Proposed Modification of NPDES Permit
Naval Submarine Base
(Floating Drydock)
Pearl Harbor, Oahu

The proposed modifications to the Navy's current NPDES permit for discharges at their submarine base floating drydock request the elimination of monitoring at two of the discharge sources and a change in the frequency of monitoring to once yearly at an additional five other discharge sources. We have reviewed the proposed modifications with the assistance of Keith Chave and William Green, Oceanography; Paul Ekern, Water Resources Research Center; Roy Takekawa, Environmental Health and Safety; Art Mori, Chemistry; and Scott Derrickson, Environmental Center.

An objective review of the potential environmental affects of the proposed modifications is hampered due to the lack of information provided concerning effluent emissions from any of the drydock discharge sources for which modifications are requested. The data provided in the Navy's fact sheet comes from 001, the sole discharge source for which monitoring modifications are not being requested. Furthermore, the Navy has not included the rationale in requesting the modifications to their NPDES permit. Justification for modifying the frequency of monitoring to once a year should be cited. Monitoring only once a year could leave room for unexpected and unmonitored discharges throughout the remainder of the year that could have significant environmental consequences depending on the quality of the discharge (which is not provided). Inclusion of specific information relating to these discharge sources would seem to be indicated. A schematic diagram of the floating drydock system would help to spatially locate the discharge sources for which changes to the NPDES Permit are being requested.

In Section A.1 proposed effluent limitations, the limitations for Serial Discharge 001 are based on EPA's "Draft document for proposed best management practices for the shipbuilding and repair industry: drydocks point source category." Seeking of a permit modification is based on "best professional judgement." The source of this "best professional judgement" should be cited as well as the criteria used in determining the effluent limitations.

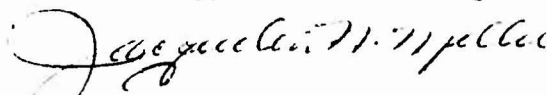
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Page 2, paragraph 3, states: "The proposed modification will not result in any significant alteration of the overall intent of the subject permit." This statement seems to indicate that the requested permit changes will result in an alteration of the overall intent of the subject permit, however, this alteration will not be "significant". The basis for this judgement regarding the "significance" of the alteration is not given.

On page 1, line 4, of the Navy's fact sheet the word "traces" when referring to discharges is inappropriate. Concentrations of heavy metals are being measured in mg/l^{-1} from discharge 001 (Table, p. 2). Ambient seawater concentrations for many heavy metals are measured in ng/l^{-1} . Therefore relative to seawater, discharge concentrations from Serial Discharge 001 appear very high.

We appreciate the opportunity to provide our comments on this permit and hope you will find them useful in your evaluation of the requested action.

Yours truly,



Jacquelin N. Miller
Acting Associate Director

cc: Patrick Takahashi
OEQC
William Green
Paul Ekern
Roy Takekawa
Keith Chave
Art Mori
Scott Derrickson